

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

UNITED STATES OF AMERICA	§	
	§	
VS.	§	Criminal No. 7:19-cr-00522-1
	§	
RICARDO QUINTANILLA, et. al.	§	

**MOTION TO AMEND ORDER GRANTING TRAVEL OUTSIDE
OF THE SOUTHERN DISTRICT OF TEXAS**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, RICARDO QUINTANILLA, Defendant in the above entitled and numbered cause, and requests an amended order correcting the first day of the week for travel in the Court's order granting permission to travel outside of the Southern District of Texas, McAllen Division and for good cause shows the following:

I.

On May 30, 2019, Defendant filed a motion to travel outside the Southern District of Texas in order to chaperone his daughter on her senior trip. [Dkt. No. 66]. In the motion, Defense counsel inadvertently cited the wrong first day of the week for travel but the correct day of the month (i.e., Motion the motion stated "...Wednesday, June 9th, 2019, through Saturday, June 15th, 2019..."). [Id.]. Instead, the motion should have read, "Sunday, June 9, 2019, through Saturday, June 15th, 2019." As a result of defense counsel's error, the Court's Order granting the motion contained the incorrect day of the week. [Dkt. No. 69]. To avoid any issues with the Probation Office, Defendant respectfully requests an amended order correcting the day of the week.

II.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully prays that this Court grant him these days to travel outside the Southern District of Texas McAllen Division as requested.

Respectfully submitted,

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By: /s/ Jaime Peña

JAIME PEÑA

State Bar No. 90001988

CERTIFICATE OF CONFERENCE

This is to certify that prior to the filing of the substantive motion [Dkt. 66] that the undersigned defense counsel conferred with Assistant United States Attorney in regard to this motion. The Government indicated that it is not opposed to the motion.

/s/ Jaime Peña

JAIME PENA

CERTIFICATE OF SERVICE

I, Jaime Peña, hereby certify that a copy of the above and foregoing Motion has been electronically delivered to the Assistant United States Attorney, United States Attorney's Office, 1701 West Business Highway 83, McAllen, Texas on this 3rd day of June, 2019.

/s/ Jaime Peña

JAIME PENA